

28 August 2023

Stephanie Ganis  
Design Coordinator  
ADCO  
Level 2, 7-9 West Street  
North Sydney NSW 2060

**Re: Broadwater archaeological exemption notification**

Dear Stephanie,

School Infrastructure New South Wales (SINSW) on behalf of the Department of Education (DoE) proposes to make modifications to the Broadwater Public School, which includes the demolition of current school buildings, and construction of new buildings.

The school is one of nine in the Northern Rivers region of NSW significantly affected by the floods in early 2022. The flood damage rendered most of the building on site as unrepairable and the school is not in use currently due to structural damage and mould.

EMM Consulting Pty Limited (EMM) was engaged by SINSW to prepare baseline historical heritage assessments (hereafter baseline assessment) to contribute to the design of the recovery program. The baseline assessment identified two areas of archaeological potential (Plate 1). The south most area was identified as having the potential to retain archaeological resources associated with the former school building and former schoolteacher's residence. At the time of preparation of the baseline assessment, the master plan for new buildings proposed at Broadwater Primary School intersected with these areas of archaeological potential (Plate 2).

A subsequent redesign has relocated the proposed buildings outside the areas of archaeological potential (Plate 3). A service reticulation trench will run through the south most area of archaeological potential (Plate 4). The service reticulation trench follows the allotment boundary that existed between the former school building and former school teacher's residence. As such, there are no known or potential archaeological resources in the alignment of the service reticulation trench.

A review of the civil drawings indicates a number of subsurface lines are proposed across the proposed playing field and on the north and east side of the half basketball/netball court that will be reinstated. These lines intersect with the areas of archaeological potential (Plate 1, Plate 4). ADCO have advised that the construction methodology will introduce fill material in these areas and no impacts to the existing ground surface is proposed.

It is EMM's opinion that the redesign and construction methodology, as intimated to EMM, has removed the previously identified impact to areas of archaeological potential. Archaeological testing is therefore no longer warranted. EMM have provided the preceding advice on the basis that:

- Changes to the plans will require a review to ensure that archaeological impacts are not being introduced. This includes changes in construction methodology that would result in disturbance of the existing/current ground surface in the replacement playing field area and adjacent to the reinstated half basketball/netball court.
- The unexpected finds procedure provided by EMM must be integrated into the construction environmental management plan and implemented in the unlikely event that archaeological resources are identified during construction.

Yours sincerely

A handwritten signature in black ink that reads "J. Lampard". The signature is written in a cursive, flowing style.

**Dr Susan Lampard**  
Associate Archaeologist  
[slampard@emmconsulting.com.au](mailto:slampard@emmconsulting.com.au)



Plate 1 Areas of archaeological potential



**Plate 2**      **The proposed site plan for Broadwater Public School Option 1.**

Source: Pedavoli draft Masterplan September 29 2022, p.12.

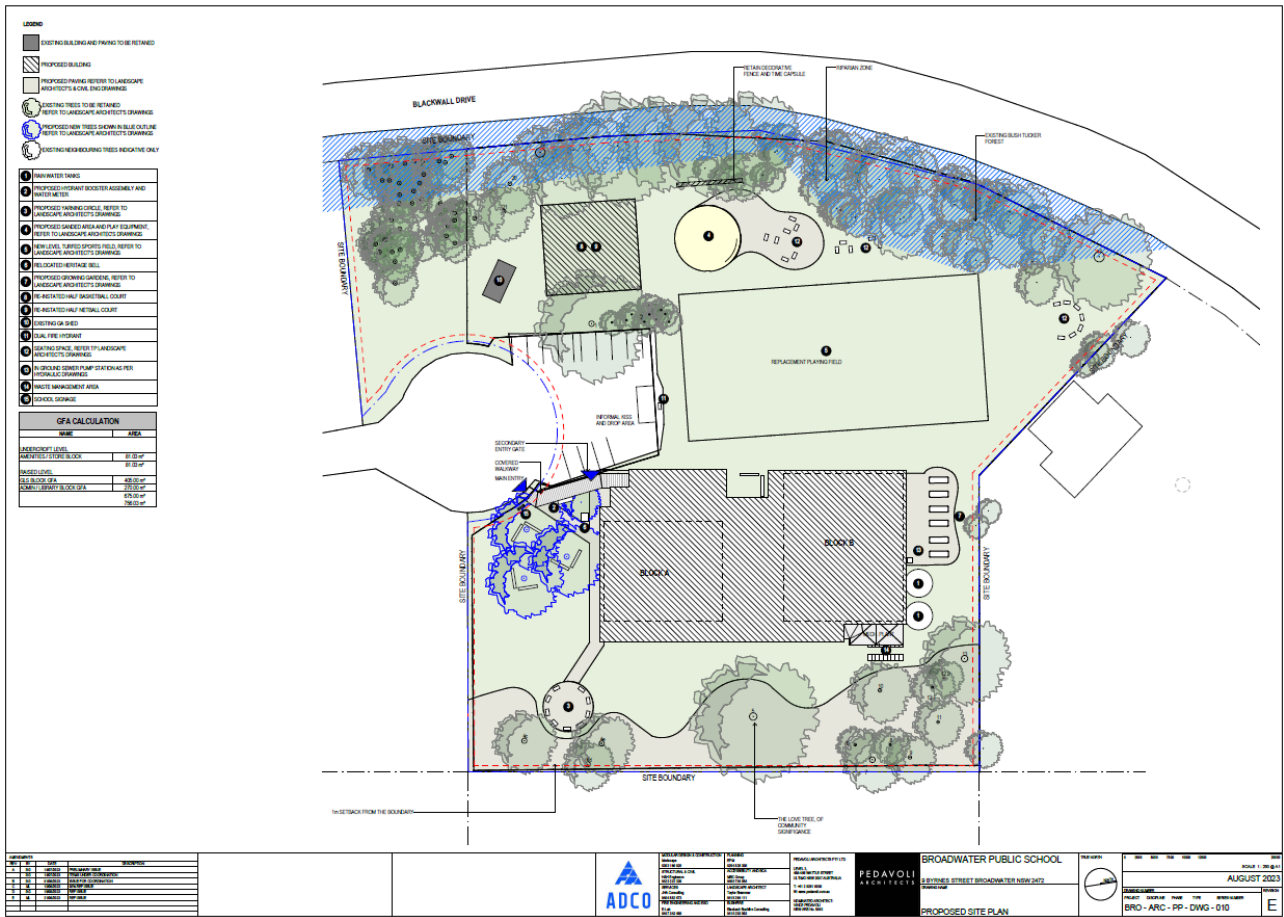


Plate 3 Revised site plan for Broadwater Public School

Source: Pedavoli



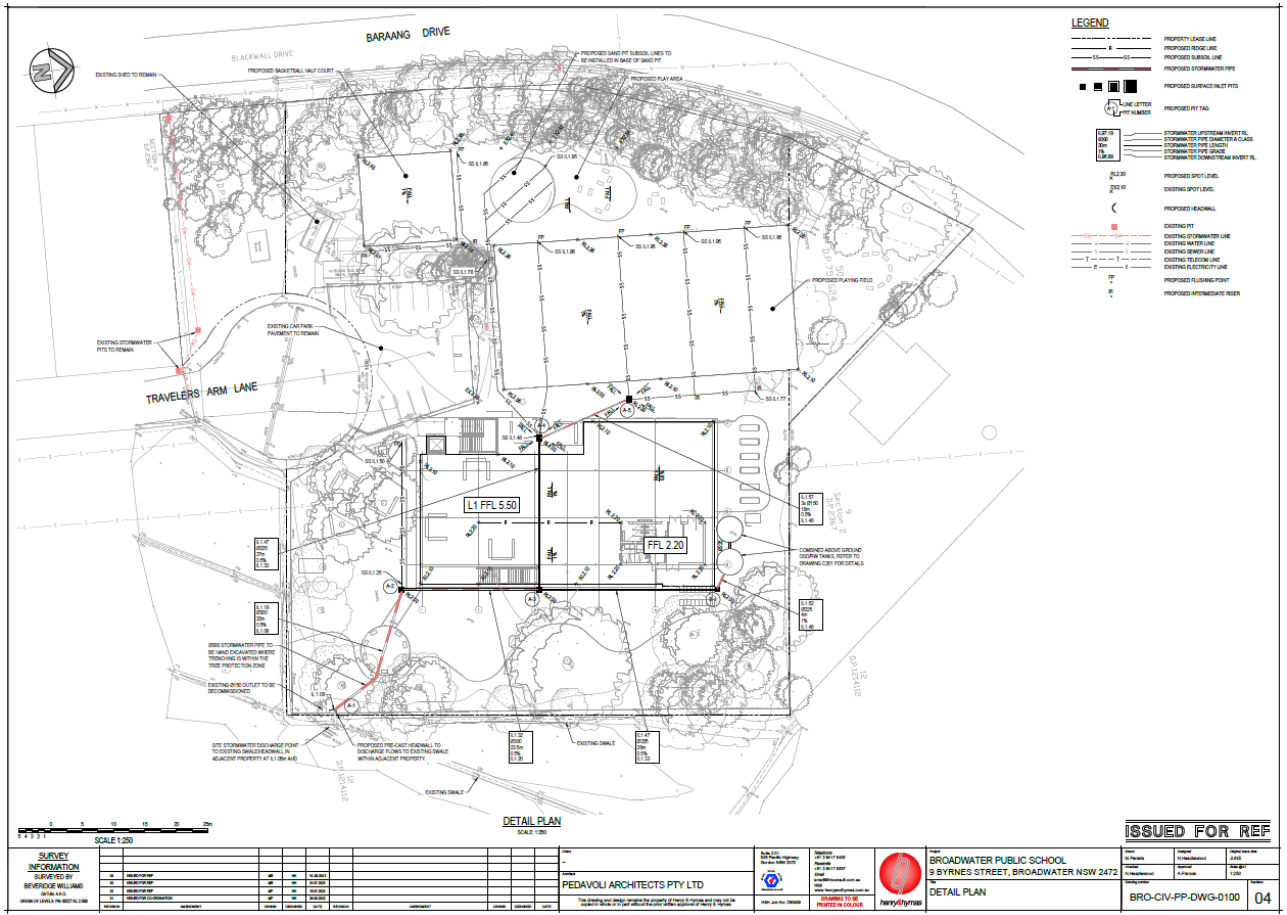


Plate 4 Services plan for Broadwater Public School

Source: ADCO